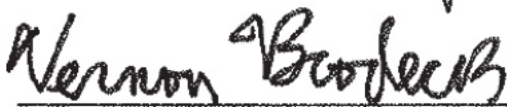


SO ORDERED:



HON. VERNON S. BRODERICK  
UNITED STATES DISTRICT JUDGE

The briefing schedule for any pretrial motions is hereby adjourned. The parties are directed to submit an updated letter proposing a new motions schedule and trial date. The parties are advised that the Court's next available trial date is June 2, 2025.

Dated: August 9, 2024

**Via ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Darryl Cohen et al.*, 23 Cr. 134 (VSB)**

Dear Judge Broderick,

We write on behalf of our client, Darryl Cohen, to request a trial continuance and the below extensions to the upcoming deadlines in Mr. Cohen's case. The government consents to this request.

Defense counsel requests extensions of both the motions and trial date, principally because the undersigned expects to be on parental leave beginning in November 2024, making the current trial date logistically untenable. In addition, defense counsel is still in the process of reviewing the complex and voluminous discovery in Mr. Cohen's case. The Government and defense jointly propose the below motions schedule and trial date, subject to the Court's availability. The Government has informed defense counsel that it will object to any further extensions of the trial date.

<u>Deadline</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Motions	August 12, 2024	October 21, 2024
Oppositions	September 16, 2024	November 25, 2024
Replies	October 7, 2024	December 16, 2024
Trial date	February 18, 2025	May 6, 2025

We thank the Court for its consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, reading "Michael Bloch". The signature is written in a cursive style with a large, stylized "M" and "B".

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Michael L. Bloch